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BAC Home Loans Servicing, LP,  
Bank of America, N.A., ReconTrust  
Company, N.A., and MERS*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CODY B. WEST,

Plaintiff,

vs.

BANK OF AMERICA HOME LOANS, BANK  
OF AMERICA, N.A., BAC HOME LOANS  
SERVICING, LP, RECONTRUST COMPANY,  
and MERS (MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS),

Defendant.

Case No.: 2:10-cv-01950-GMN-LRL

**PROPOSED DISCOVERY PLAN AND  
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH  
LR 26-l(e)**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, Plaintiff CODY WEST (“Plaintiff”), and Defendants BAC Home Loans Servicing, LP (as named and also improperly named as "Bank of America Home Loans") ("BAC"), Bank of America, N.A. (“BOA N.A.”), ReconTrust Company, N.A. ("ReconTrust") (collectively "BOA Defendants"), and Mortgage Electronic Registration Systems (“MERS”) (collectively “Defendants”), hereby submit the following proposed Discovery Plan and Scheduling Order:

1. Discovery Cut-Off Date: The parties propose the discovery cut-off date to be June 1, 2011. This date is 180 days from the first date that a defendant responded to the complaint in

1 this case.

2 2. Amended Pleadings and Adding Parties: The last date to file motions to amend  
3 the pleadings or add parties is March 3, 2011, 2011.

4 3. Expert Disclosures: Expert disclosures are due by April 1, 2011 and rebuttal  
5 disclosures are due by May 2, 2011.

6 4. Dispositive Motions: Dispositive motions will be filed by July 1, 2011.

7 5. Pretrial Order: The Pretrial Order must be filed by August 1, 2011, unless dispositive  
8 motions have been filed, in which event the Pretrial Order will be due thirty days after decision or  
9 further order of the Court.

10 6. Initial Disclosures: The parties will make their initial disclosures no later than  
11 fourteen (14) days after the entry of this order.

12 7. Statement of Parties' Positions on Points in Dispute: None.

13 8. What changes should be made in the timing, form, or requirement for disclosures  
14 under Rule 26(a): None.

15 9. Subjects on which discovery may be needed: All material issues raised in the  
16 pleadings.

17 10. Whether discovery should be conducted in phases or be limited to or focused on  
18 particular issues: No.

19 11. Issues about disclosure or discovery of electronically stored information, including  
20 the form or forms in which it should be produced: Electronically stored information should be  
21 disclosed and produced in accordance with FRCP 26 and 34.

22 12. Issues about claims of privilege or of protection as trial-preparation materials,  
23 including – if the parties agree on a procedure to assert theses claims after production – whether to  
24 ask the court to include their agreement in an order: None.

25 13. What changes should be made in the limitations on discovery imposed under these  
26 rules or by local rule, and what other limitations should be imposed: None.

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14. Other orders that the court should issue under Rule 26(c) or under Rule 16(b) and  
(c): None.

DATED this 5th day of April, 2011.

DATED this 5th day of April, 2011.

**AKERMAN SENTERFITT LLP**

/s/ Christine M. Parvan  
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*Pro Se Plaintiff*

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*BAC Home Loans Servicing, LP, and ReconTrust*  
*Company, N.A.*

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

Dated: 4-8-11

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